

1 Hon. Thomas S. Zilly  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

10 ESTHER HOFFMAN; et al.,  
11 PLAINTIFFS,  
12 v.  
13 TRANSWORLD SYSTEMS  
14 INCORPORATION; et. al.,  
15 DEFENDANTS.

Case No.: 18-cv-1132-TSZ

**STIPULATED MOTION AND ORDER  
CONTINUING CLASS DISCOVERY AND  
CLASS CERTIFICATION DEADLINES**

18 I. STIPULATED MOTION  
19

20 Pursuant to LCR 7(d)(1) and LCR 10(g), Plaintiffs and Defendants hereby stipulate and  
21 jointly request that the Court enter an order continuing the deadlines for class discovery and  
22 class certification and the hearing date on Defendant Transworld Systems Inc.’s (“TSI”)  
23 Motion for Summary Judgment. In support of this motion for continuance, the parties stipulate  
24 as follows:

25 1. The Court set a deadline of August 30, 2021 for the parties to complete class  
26 discovery. Dkt #146.  
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1       2.     The Court set a deadline of October 14, 2021 for Plaintiffs to move for class  
2 certification. Dkt #146.

3       3.     Defendant TSI filed a Motion for Summary Judgment (Dkt. #161) which this  
4 Court deferred until November 5, 2021. Dkt. #191.

5       4.     The parties have been diligently pursuing discovery, but outstanding discovery  
6 issues remain. The parties expect that a 60-day continuance will allow for the outstanding  
7 discovery issues to be resolved and for TSI's Motion for Summary Judgment and Plaintiffs'  
8 forthcoming Motion for Certification to be decided on the merits by this Court.  
9

10      5.     As such, the parties have met and conferred and agree that: (a) the Deadline to  
11 Complete Class Discovery should be continued to October 30, 2021; (b) the Deadline for  
12 Plaintiffs to move for class certification should be continued to December 13, 2021, and such  
13 motion should be noted on February 18, 2022, with the deadline for opposition to be January  
14 31, 2022; (c) the consideration date for Defendant TSI's Motion for Summary Judgment (Dkt.  
15 #161) should be continued to February 18, 2022; (d) Plaintiffs' Amended Response to  
16 Defendant TSI's Motion for Summary Judgment should be due on January 3, 2022; (e) the date  
17 Plaintiffs will identify any expert witnesses and areas of expert testimony that may be relied  
18 upon by them in support of their motion for certification should be no later than October 30,  
19 2021; and (f) TSI's responses to Plaintiffs' Second Set of Interrogatories and Requests for  
20 Production should be due on September 10, 2021. All other deadlines should remain as  
21 scheduled.  
22

23       STIPULATED this 1st day of September, 2021.  
24

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26      LEONARD LAW  
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28      BERRY & BECKETT, PLLP

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37      STIPULATED MOTION AND ORDER  
38      CONTINUING CLASS DISCOVERY AND  
39      CLASS CERTIFICATION DEADLINES - 3  
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20 **II. ORDER**

21 The Court, having considered the stipulated motion and being fully informed,

22 **IT IS HEREBY ORDERED THAT:**

23 1. The date for discovery on class certification issues to be completed is continued  
24 to October 30, 2021;

25 2. The deadline for Plaintiffs to file motions related to class certification is  
26 continued to December 13, 2021, and such motions are to be noted on February 18, 2022, with  
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the deadline for opposition to be January 31, 2022;

3. The consideration date for Defendant TSI's Motion for Summary Judgment (Dkt. #161) is continued to February 18, 2022;

4. Plaintiffs will identify any expert witnesses and areas of expert testimony that may be relied upon by them in support of their motion for class certification by October 30, 2021; and

5. TSI's responses to Plaintiffs' Second Set of Interrogatories and Requests for Production are due on September 10, 2021.

DATED this 2nd day of September, 2021.

Thomas S. Zilly  
Thomas S. Zilly  
United States District Judge

Presented by:

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